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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

OSCAR L . DAVIS
PLAINTIFF

VS.

CIVIL ACTION : 08-560-

CG-17

COMPASS BANK
HOSEA MARIA GARCIA MEYERS
CHUCK STEVENS
CHUCK STEVENS C / D / J
BOBBY HENSELL
DEFENDANT

FILED SEP 29 08 PM 2 21 USDC ALA

COMPLAINT

THIS COMPLAINT STEMS OUT OF THE MISREPRESENTATION AND THE CONSPIRACY TO DEFRUAD PLAINTIFF BY THESE DEFENDANTS IN A(N) ATTEMPT TO PURCHASE A CAR FROM CHUCK STEVENS CHRYSLER - DODGE - JEEP. SEVERAL CONTRACTS WERE MADE BY AGENT OF COMPASS BANK AND CHUCK STEVENS AND CHUCK STEVENS CHRYSLER - DODGE - JEEP. SEVERAL CONTRACTS TO PURCHASE (1) 2008 JEEP COMPASS , REFLECTING DIFFERENT AMOUNTS FOR PURCHASE PRICE AND DIFFERENT TITLE APPLICATION SHOWING A CAR OTHER THAN THE 2008 JEEP COMPASS . PLAINTIFF WERE COERECED INTO SIGNING THE DIFFERENCE CONTRACTS WITHOUT A CLEAR UNDERSTANDING OF WHAT HE WERE BUYING OR THE PURCHASE PRICE . AFTER SEVERAL ATTEMPTS BY PLAINTIFF TO GET THE DEFENDANTS TO CLARIFY BY PHONE AND WRITTEN LETTERS TO NO AVAIL ; PLAINTIFF HAVE NO OTHER CHOICH BUT FILE THIS LAW SUIT ; DEFENDANTS ARE IN VIOLATION OF 15 U . S . C . A . 1691 et seq (EQUAL CREDIT OPPORTUNITY ACT .)

COUNT I --- MISREPRESENTATION

THE DEFENDANTS ALTERED THE SALE PRICE FROM THE MANUFACTURE'S SUGGESTED RETAIL PRICE ON THE FEDERAL WINDOW

STICKER ON THE 2008 JEEP COMPASS, RAISING THE PROFIT FOR THE DEFENDANTS OVER \$ 5000.00 DOLLARS , WITHOUT ADDING ANY OTHER EQUIPMENT.

WHEREFORE PLAINTIFF DEMANDS DAMAGES IN EXCESS OF STATUTORY MINIMUM OF THIS COURT , PLUS ALL COST ASSOCIATED WITH THIS ACTION .

COUNT II ----- CONSPIRACY TO DEFRUAD

THE DEFENDANTS CONSPIRED TO DEFRUAD THE PLAINTIFF BY RAISING THE MANUFACTURES SUGGESTED RETAIL PRICE OF THE 2008 JEEP COMPASS TO REFLECT THE AMOUNT FINANCE TO EXCEED \$ 7000.00 DOLLARS OVER THE MANUFACTURE'S SUGGESTED RETAIL PRICE AND RAISING THE INTEREST RATE , SO AS TO PREVENT PLAINTIFF FROM RECIEVING PAYMENTS HE IS ENTITLED TO OR REFINANCING THIS VEHICLE TO ACHIEVE A MORE DESIRABLE PAYMENT .

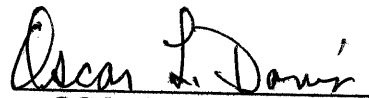
WHEREFORE PLAINTIFF DEMANDS DAMAGES OF \$ 250,000.00 DOLLARS COMPENSATORY DAMAGES AND \$ 750 ,000.00 DOLLARS PURNITIVE DAMAGES PLUS ALL COST ASSOCIATED WITH THIS ACTION .

COUNT III ----- FRUAD

THE DEFENDANTS DEFRUADED PLAINTIFF BY CO-ERCING PLAINTIFF TO SIGN MULTIPLE CONTRACTS AND TITLE APPLICATIONS , LEAVING PLAINTIFF NOT KNOWING EXACTLY WHAT HE WERE BUYING OR HOW MUCH HE IS PAYING FOR THIS 2008 JEEP COMPASS OR IF HE REALLY PURCHASED A 2007 DODGE CHARGER .

WHEREFORE PLAINTIFF DEMANDS COMPENSATORY DAMAGES OF \$ 500 ,000 .00 DOLLARS AND PURNITIVE DAMAGES OF \$ 500 ,000 .00 DOLLARS PLUS ALL COST ASSOCIATED WITH THIS ACTION . PLAINTIFF MOVES THIS COURT TO STAY EXECUTION OF ALL CONTRACTS IN THIS MATTER PENDING TRIAL. PLAINTIFF DEMANDS TRIAL BY JURY .

DONE THIS 29~~th~~ DAY OF SEPTEMBER 2008 .


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